

## REMARKS

Claims 1 to 39 are pending in the present application. Claim 38 has been amended for which there is support in the specification, claims and drawings as originally filed.

Reconsideration of the Examiner's decisions and reexamination of this application are respectfully requested.

### Claim objections:

Claim 38 was objected to by the Examiner because of certain informalities. Claim 38 has been amended as requested by the Examiner.

### The §103 rejections:

I. Claims 1, 2, 4 to 26 and 27 to 37 have been rejected by the Examiner under 35 USC §103(a) as being unpatentable over Hefter U.S. Patent 7,092,699 (hereafter "Hefter") in view of Sawada U.S. Patent 6,735,619 (hereafter ("Sawada")).

(It is believed that the Examiner meant to include claims 38 and 39 in this rejection as well.)

It is submitted that the Examiner has failed to state a *prima facie* case of obviousness.

Hefter is concerned with synchronizing the memory of a wireless telephone with a networked computer over a wireless link. There is nothing in Hefter to suggest in any way that the teachings therein are applicable to a home network. Sawada is concerned with providing a home network gateway apparatus to control home network devices connected to an IEEE 1394 bus in a unified manner in a household. The combined references are not concerned with the enabling of remote control of services at a residential network without the necessity of a service provider.

A. Regarding claims 1 and 27 to 30, it is submitted that the combination of Hefter and Sawada fails to teach every step of Applicants' invention. The Examiner alleges that Hefter teaches a service interaction method for a user to interact with at least one remote service accessible through a home data distribution network. There is nothing in Hefter to suggest that there is interaction of any service and certainly there is no teaching of a home data distribution network. The Examiner further alleges that Hefter discloses enabling remote control services at a residential network without the necessity of a service provider and points to col. 4, ll 44-46 and col. 9, ll 33-42 for support of this position. There is nothing in Hefter to support this statement by the Examiner since Hefter does not remotely control any services. Hefter merely synchronizes the memory of a wireless telephone with a networked computer over a wireless link. The Examiner further alleges Hefter's use of a cellular voice network and a PSTN connecting a serving entity attached to said home data distribution network. It is arguably true that Hefter uses a cellular voice network and a PSTN to connect a computer to a cell phone, however, there is nothing in Hefter that discloses connecting a cellular voice network and a PSTN to a home data distribution network. It is thus submitted that Hefter is insufficient as a primary reference.

Sawada may teach other steps of Applicants' method, articles and apparatus but fails to supply the deficiencies of Hefter.

Moreover, it is submitted that there would be undue experimentation required to combine Hefter and Sawada since these references are directed to two entirely different inventions. In particular, Hefter is directed to simply synchronizing memory of a wireless telephone with a networked computer over a wireless link. There is no interacting, such as enabling of remote control of services, between the computer and wireless telephone. Accordingly, protocols would have to be selected in order to make the interacting possible. This is not taught by Hefter. Similarly, Sawada is simply directed to monitoring of devices through a computer on the WWW. Other protocols would have to be selected in order to allow connection to a cellular device through a PSTN network. These protocols also are not taught. So, it must be concluded that Hefter and Sawada can only be combined with undue experimentation or by using the teaching of Applicants' inventions. Either of these mandates the patentability of Applicants' claims 1 and 27 to 30.

Inasmuch as claims 2 and 4 to 26 depend from claim 1, and since claim 1 is believed to be patentable, then claims 2 and 4 to 26 should be patentable as well.

In addition, claims 5, 6, 8, and 12 to 14 are submitted to be independently patentable.

Claim 5 recites “wherein the step of viewing is performed employing a viewing device collocated with said client device”. The Examiner’s reference to Hefter (col. 5, ll 46-51) merely teaches the transmission of information from the computer to the wireless telephone and vice versa. There is nothing in this portion of Hefter pertaining to the viewing device being collocated with the client device and thus the combination of Hefter and Sawada cannot render Applicants’ claim 5 obvious.

Claim 6 recites “wherein the viewing device depicts information in a form including at least one of: text, graphics, images, light display, voice or any combination of these”. Again, the Examiner’s reference to Hefter (col. 5, ll 46-51) merely teaches the transmission of information from the computer to the wireless telephone and vice versa. There is nothing in this portion of Hefter pertaining to the form of information depicted on the viewing device and thus the combination of Hefter and Sawada cannot render Applicants’ claim 6 obvious.

Claim 8 recites “wherein the step of viewing is performed employing a web-browser and the serving entity is a web-server”. Sawada does disclose a web-browser and a web-server. However, since claim 8 depends from claims 5 and 1, reading these claims together requires the web-browser collocated with the client device wherein the client device is attached to a wireless, circuit-switched, voice telephony network. In the case of Sawada, the web-browser is at a terminal and not collocated with the client device. Therefore, the combination of Hefter and Sawada cannot render Applicants’ claim 8 obvious.

Claim 12 recites “further comprising said serving entity employing attributes of said circuit switch network in authenticating said user”. The cited portion of Hefter (col. 9, ll 33-55) only discloses switching and not authentication of the user. Therefore, the combination of Hefter and Sawada cannot render Applicants’ claim 12 obvious.

Claim 13, which is dependent from claim 12, recites “wherein said attributes include a telephone number of said client device” and claim 14, which is also dependent from claim 12

recites “wherein said attributes include a telephone number of said serving entity”. The cited portion of Hefter (col. 9, ll 33-55) only discloses switching and not authentication of the user. Therefore, the combination of Hefter and Sawada cannot render Applicants’ claims 13 and 14 obvious.

**B.** Regarding claim 31, there are several features that are not shown or taught by Hefter or Sawada. The Examiner alleges that Hefter teaches an apparatus that attaches on a home network for a user using a client device attached to a wireless, circuit-switched, voice telephony network, to interact with at least one service on said home network. Hefter is concerned with synchronizing the memory of a wireless telephone with a networked computer over a wireless link. There is nothing in Hefter to suggest in any way that the teachings therein are applicable to a home network or that there is any interaction with a service. The Examiner further alleges that Hefter discloses a telephone modem to directly receive an incoming call from a client device and references col. 7, lines 1-20 of Hefter for support. This reference is to the various apparatus that make up the PSTN as shown in Figures 1 and 6 of Hefter. There is nothing in this portion of Hefter relating to a telephone modem. The Examiner further alleges that Hefter discloses a dial-in service module to implement dial-in logic and a protocol transport module to implement protocols and points to page 2, paragraph [0014] of Hefter. Applicants’ review of Hefter does not disclose a dial-in service module, dial-in logic and a protocol transport module. The reference to page 2, paragraph [0014] of Hefter is obviously incorrect since Hefter does not have paragraph numbers. Further clarification from the Examiner is respectfully requested.

The Sawada reference does provide a methodology to display data on a terminal but does not disclose “a protocol transport module to implement protocols needed to transport data back and forth between a browser application in the client device and said browser server module” since Applicants’ client device employs “only one of a cellular voice network and a PSTN” as opposed to Sawada’s terminal which is a different device requiring different protocols.

In view of the foregoing remarks, it is submitted that the combination of Hefter and Sawada cannot render Applicants’ claim 31 obvious.

Inasmuch as claims 32 to 37 and 39 depend from claim 31, and since claim 31 is submitted to be patentable, then claims 32 to 37 should be patentable as well.

In addition, claim 33 is submitted to be independently patentable. Claim 33 recites “wherein said data sent to the client device are displayed and viewed by the browser application in the client device”. Sawada does disclose a web-browser and a web-server. However, Applicants’ claim 33 requires the browser application is in the client device wherein the client device is attached to a wireless, circuit-switched, voice telephony network. In the case of Sawada, the web-browser is at a terminal and not in the client device as defined and claimed by Applicants. Therefore, the combination of Hefter and Sawada cannot render Applicants’ claim 33 obvious.

**C.** Regarding claim 38, inasmuch as this claim depends from claim 1, and claim 1 is believed to be patentable, then claim 38 should be patentable as well.

**II.** Claim 3 has been rejected by the Examiner under 35 USC §103(a) as being unpatentable over Hefter in view of Sawada and further in view of Kawasaki et al. U.S. Patent 6,988,070 (hereafter “Kawasaki”).

Inasmuch as claim 3 depends from claim 1, and claim 1 is believed to be patentable, then claim 3 should be patentable as well.

Summary:

In view of all of the preceding remarks, it is submitted that all of claims 1 to 39 are in condition for allowance. Further action with respect to the present application is earnestly solicited.

Respectfully submitted,  
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